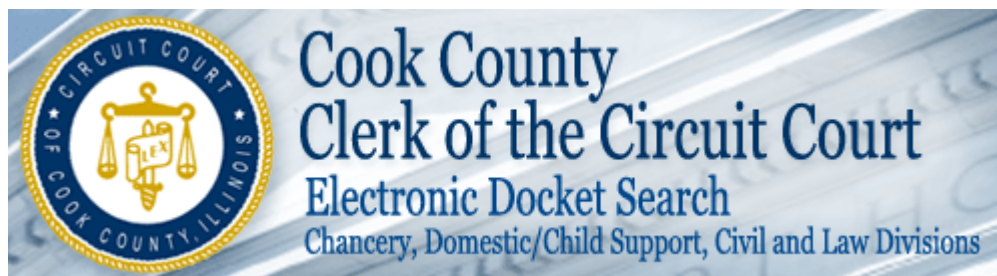


EXHIBIT A



Case Information Summary for Case Number
2019-L-007023

Filing Date: 06/25/2019

Division: Law Division

Ad Damnum: \$50000.00

Case Type: PERSONAL
INJURY (SILICON
IMPLANT)

District: First Municipal

Calendar: E

Party Information

Plaintiff(s)

SALVAGE MICHAELYN

Attorney(s)

RUBERRY STALMACK
GARVEY

10 S LASALLE #1800

CHICAGO IL, 60603

(312) 466-8050

Defendant(s)

LEONARD LU

MENTOR WORLDWIDE,
LLC

NEW HORIZONS CENTER
FOR C

Defendant Date of Service

Attorney(s)

Case Activity

Activity Date: 06/25/2019

Participant: SALVAGE MICHAELYN

PERSONAL INJURY (SILICON IMPLANT) COMPLAINT FILED

Court Fee: 368.00

Attorney: RUBERRY STALMACK
GARVEY

Ad Damnum Amount: 50000.00

Activity Date: 06/25/2019

Participant: SALVAGE MICHAELYN

SUMMONS ISSUED AND RETURNABLE

Ad Damnum Amount: 50000.00

Attorney: RUBERRY STALMACK
GARVEY

Activity Date: 06/25/2019

Participant: SALVAGE MICHAELYN

SUMMONS ISSUED AND RETURNABLE

Ad Damnum Amount: 50000.00

Attorney: RUBERRY STALMACK
GARVEY

Activity Date: 06/25/2019

Participant: SALVAGE MICHAELYNN

SUMMONS ISSUED AND RETURNABLE

Ad Damnum Amount: 50000.00

Attorney: RUBERRY STALMACK
GARVEY

Activity Date: 09/05/2019

Participant: SALVAGE MICHAELYNN

EXHIBITS FILED

Attorney: RUBERRY STALMACK
GARVEY

Activity Date: 09/05/2019

Participant: SALVAGE MICHAELYNN

NOTICE FILED

Attorney: RUBERRY STALMACK
GARVEY

Activity Date: 09/05/2019

Participant: SALVAGE MICHAELYNN

MOTION FILED

Attorney: RUBERRY STALMACK
GARVEY

Activity Date: 09/05/2019

Participant: SALVAGE MICHAELYNN

MOTION SCHEDULED

Date: 09/17/2019
Court Time: 0900

Attorney: RUBERRY STALMACK
GARVEY

Activity Date: 09/13/2019

Participant: SALVAGE MICHAELYN

ELECTRONIC NOTICE SENT

Attorney: RUBERRY STALMACK
GARVEY

Microfilm: LD000000000

Activity Date: 09/13/2019

Participant: SALVAGE MICHAELYNN

CASE MANAGEMENT DATE GENERATED

Date: 11/07/2019
Court Time: 0900

Activity Date: 09/17/2019

Participant: SALVAGE MICHAELYN

VOLUNTARY DISMISSAL W/LEAVE TO REFILE-ALLOWED

Judge: FLANAGAN, KATHY M

[Back to Top](#)

Please note: Neither the Circuit Court of Cook County nor the Clerk of the Circuit Court of Cook County warrants the accuracy, completeness, or the currency of this data. This data is not an official record of the Court or the Clerk and may not be represented as an official court record.

If data does not appear in a specific field, we likely do not have the responsive data in our master database.

Hearing Date: No hearing scheduled
 Courtroom Number: No hearing scheduled
 Location: No hearing scheduled

(05/27/16) CCL 0520

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

MICHAELYNN SALVAGE

v.

MENTOR WORLDWIDE, LLC, a Foreign Corporation, et al.

FILED
 6/25/2019 2:49 PM
 DOROTHY BROWN
 CIRCUIT CLERK
 COOK COUNTY, IL
 2019L007023

5547602

2019L007023

No.

CIVIL ACTION COVER SHEET - CASE INITIATION

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. Only one (1) case type may be checked with this cover sheet.

Jury Demand ☐ Yes ☒ No**PERSONAL INJURY/WRONGFUL DEATH****CASE TYPES:**

- ☐ 027 Motor Vehicle
☐ 040 Medical Malpractice
☐ 047 Asbestos
☐ 048 Dram Shop
☐ 049 Product Liability
☐ 051 Construction Injuries
 (including Structural Work Act, Road
 Construction Injuries Act and negligence)
☐ 052 Railroad/FELA
☐ 053 Pediatric Lead Exposure
☐ 061 Other Personal Injury/Wrongful Death
☐ 063 Intentional Tort
☐ 064 Miscellaneous Statutory Action
 (Please Specify Below**)
☐ 065 Premises Liability
☐ 078 Fen-phen/Redux Litigation
☒ 199 Silicone Implant

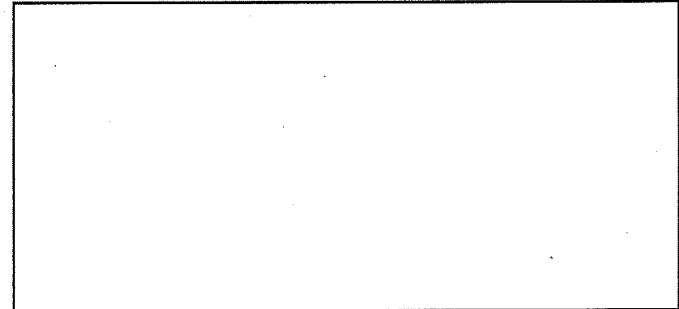
TAX & MISCELLANEOUS REMEDIES**CASE TYPES:**

- ☐ 007 Confessions of Judgment
☐ 008 Replevin
☐ 009 Tax
☐ 015 Condemnation
☐ 017 Detinue
☐ 029 Unemployment Compensation
☐ 031 Foreign Transcript
☐ 036 Administrative Review Action
☐ 085 Petition to Register Foreign Judgment
☐ 099 All Other Extraordinary Remedies

By: Craig Hoffman

(Attorney)

(Pro Se)



(FILE STAMP)

COMMERCIAL LITIGATION**CASE TYPES:**

- ☐ 002 Breach of Contract
☐ 070 Professional Malpractice
 (other than legal or medical)
☐ 071 Fraud (other than legal or medical)
☐ 072 Consumer Fraud
☐ 073 Breach of Warranty
☐ 074 Statutory Action
 (Please specify below.**)
☐ 075 Other Commercial Litigation
 (Please specify below.**)
☐ 076 Retaliatory Discharge

OTHER ACTIONS**CASE TYPES:**

- ☐ 062 Property Damage
☐ 066 Legal Malpractice
☐ 077 Libel/Slander
☐ 079 Petition for Qualified Orders
☐ 084 Petition to Issue Subpoena
☐ 100 Petition for Discovery

**

Primary Email: craig.hoffman@ruberry-law.comSecondary Email: ruberry.filing@ruberry-law.com

Tertiary Email: _____

Pro Se Only: ☐ I have read and agree to the terms of the *Clerk's Office Electronic Notice Policy* and choose to opt in to electronic notice form the **Clerk's Office** for this case at this email address: _____

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

FILED
6/25/2019 2:49 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2019L007023

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION**

MICHAELYNN SALVAGE,

Plaintiff,

v.

MENTOR WORLDWIDE, LLC, a Foreign
Corporation, NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation, and LEONARD LU, M.D.,
individually and as agent, servant and/or
employee of NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation,

Defendants.

No. 2019L007023

COMPLAINT AT LAW

COUNT I

(Product Liability - Mentor Worldwide, LLC, a Foreign Corporation)

NOW COMES the Plaintiff, MICHAELYNN SALVAGE, by and through her attorneys,
RUBERRY, STALMACK & GARVEY, LLC, and complaining of the Defendants, MENTOR
WORLDWIDE, LLC, a Foreign Corporation (said entity hereinafter referred to as “Mentor”),
states as follows:

1. In 2011 and at all times relevant herein, the Plaintiff was a resident of the City of Chicago,
County of Cook, State of Illinois.
2. In 2011 and at all times relevant herein, the Defendant was a corporation that had a mailing
address in California, but it was incorporated in the State of Delaware.

3. In 2011 and at all times relevant herein, the Defendant was licensed to conduct business the State of Illinois.

4. In 2011 and at all times relevant herein, the Defendant did conduct business in the State of Illinois.

5. In 2011 and at all times relevant herein, the Defendant did conduct business in the City of Chicago.

6. In 2011 and at all times relevant herein, the Defendant was engaged in the business of breast implant manufacturing and sales throughout the City of Chicago, County of Cook, State of Illinois.

7. In 2011 and at all times relevant herein, the Plaintiff received a consultation at New Horizons Center for Cosmetic Surgery, S.C. regarding breast implants.

8. In 2011 and at all times relevant herein, the Plaintiff underwent a procedure where Mentor silicone breast implants were surgically inserted at New Horizons Center for Cosmetic Surgery, S.C.

9. Said Mentor silicone breast implants were inserted in 2011 at New Horizons Center for Cosmetic Surgery, S.C. by Leonard Lu, M.D.

10. Said Mentor silicone breast implants were inserted in Plaintiff throughout 2011, 2012, 2013, 2014, 2015, and 2016.

11. Plaintiff began to experience numerous health issues and symptoms with respect to said Mentor silicone breast implants in 2017, including but not limited to joint pain, chronic fatigue syndrome, brain fog, temperature intolerance, dry skin, infections, headaches, breast pain, chest

pain, weight gain, autoimmune issues, and a disorder known as Breast Implant Illness, among other things.

12. Said Mentor silicone breast implants were removed from Plaintiff on June 29, 2017 by Dr. Florence Mussat in Chicago, Illinois.

13. Between 2011 and 2017 and at all times relevant herein, the Plaintiff had no notice or knowledge that said Mentor silicone breast implants were defective or would not work properly.

14. From 2017 to the present, as a result of the Mentor silicone breast implants being defective and not working properly, the Plaintiff was caused to suffer serious and debilitating injuries, including but not limited to joint pain, chronic fatigue syndrome, brain fog, temperature intolerance, dry skin, infections, headaches, breast pain, chest pain, weight gain, autoimmune issues, and a disorder known as Breast Implant Illness, among other things.

15. Prior to 2011 and at all times relevant herein, the Defendant had designed manufactured, and sold the silicone breast implants that were inserted into Plaintiff in 2011 at New Horizons Center for Cosmetic Surgery, S.C. by Leonard Lu, M.D.

16. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to exercise reasonable care and diligence to design, manufacture and sell the silicone breast implants in a reasonably safe condition.

17. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to design, manufacture and sell silicone breast implants which did not have a potential for harm beyond that which would be objectively contemplated by the ordinary user of the product.

18. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to design, manufacture and sell silicone breast implants which were not unreasonably dangerous and/or defective.

19. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to warn of known dangers, or dangers that ought to have been known.

20. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to ensure that the Plaintiff remained safe and did not become injured.

21. In 2011 and at all times relevant herein, the Defendant breached the duty of care to the Plaintiff in the following ways:

- a. Failed to design, manufacture, and/or sell silicone breast implants that were in reasonably safe condition;
- b. Failed to design, manufacture, and/or sell silicone breast implants which did not have a potential for harm beyond that which would be objectively contemplated by the ordinary user of the product;
- c. Failed to design, manufacture, and/or sell silicone breast implants which were not unreasonably dangerous and/or defective;
- d. Failed to warn the Plaintiff of the dangers and risks of said silicone breast implants which either were known and/or which ought to have been known;
- e. Failed to offer the Plaintiff a reasonable alternative to the silicone breast implants;

22. As a direct and proximate result of one or more of the foregoing acts and/or omissions of the Defendants as described above, the Plaintiff MICHAELYNN SALVAGE, was permanently injured and has suffered serious and debilitating injuries including but not limited to joint pain, chronic fatigue syndrome, brain fog, temperature intolerance, dry skin, infections, headaches, breast pain, chest pain, weight gain, autoimmune issues, and a disorder known as Breast Implant Illness, among other things; has required extensive medical treatment; has endured and will in the

future endure conscious pain and suffering; has become permanently disabled and disfigured; has suffered a loss of the enjoyment of a normal life; has suffered a loss of wages as a Chicago Police Officer; and has incurred and will incur in the future great sums for medical and rehabilitative services.

23. Plaintiff's damages are in excess of Fifty Thousand Dollars (\$50,000.00), the minimal jurisdictional amount of this Court.

WHEREFORE, the Plaintiff, MICHAELLYNN SALVAGE, by and through her attorneys, RUBERRY, STALMACK & GARVEY, LLC, prays for judgment against the Defendant, MENTOR WORLDWIDE, LLC, a Foreign Corporation, in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT II

(Negligence - Mentor Worldwide, LLC, a Foreign Corporation)

NOW COMES the Plaintiff, MICHAELLYNN SALVAGE, by and through her attorneys, RUBERRY, STALMACK & GARVEY, LLC, and complaining of the Defendants, MENTOR WORLDWIDE, LLC, a Foreign Corporation (said entity hereinafter referred to as "Mentor"), states as follows:

1-14 Plaintiff re-alleges and re-adopts paragraphs 1-14 of Count I of this Complaint as and for paragraphs 1-14 of Count II of this Complaint, in haec verba.

15. Prior to 2011 and at all times relevant herein, the Defendant Mentor had designed manufactured, and sold the silicone breast implants that were inserted into Plaintiff in 2011 at New Horizons Center for Cosmetic Surgery, S.C. by Leonard Lu, M.D.

16. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to exercise reasonable care and diligence to design, manufacture and sell the silicone breast implants in a reasonably safe condition.

17. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to design, manufacture and sell silicone breast implants which did not have a potential for harm beyond that which would be objectively contemplated by the ordinary user of the product.

18. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to design, manufacture and sell silicone breast implants which were not unreasonably dangerous and/or defective.

19. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to warn of known dangers, or dangers that ought to have been known.

20. Prior to 2011 and at all times relevant herein, the Defendant owed a duty of care to the Plaintiff to ensure that the Plaintiff remained safe and did not become injured.

21. In 2011 and at all times relevant herein, the Defendant breached the duty of care to the Plaintiff in the following ways:

- a. Failed to design, manufacture, and/or sell silicone breast implants that were in reasonably safe condition;
- b. Failed to design, manufacture, and/or sell silicone breast implants which did not have a potential for harm beyond that which would be objectively contemplated by the ordinary user of the product;
- c. Failed to design, manufacture, and/or sell silicone breast implants which were not unreasonably dangerous and/or defective;
- d. Failed to warn the Plaintiff of the dangers and risks of said silicone breast implants which either were known and/or which ought to have been known;

e. Failed to offer the Plaintiff a reasonable alternative to the silicone breast implants;

22. As a direct and proximate result of one or more of the foregoing acts and/or omissions of the Defendants as described above, the Plaintiff MICHAELYNN SALVAGE, was permanently injured and has suffered serious and debilitating injuries including but not limited to joint pain, chronic fatigue syndrome, brain fog, temperature intolerance, dry skin, infections, headaches, breast pain, chest pain, weight gain, autoimmune issues, and a disorder known as Breast Implant Illness, among other things; has required extensive medical treatment; has endured and will in the future endure conscious pain and suffering; has become permanently disabled and disfigured; has suffered a loss of the enjoyment of a normal life; has suffered a loss of wages as a Chicago Police Officer; and has incurred and will incur in the future great sums for medical and rehabilitative services.

23. Plaintiff's damages are in excess of Fifty Thousand Dollars (\$50,000.00), the minimal jurisdictional amount of this Court.

24. Plaintiff's attorney has filed herewith, an affidavit pursuant to the provisions of 735 ILCS 5/2-622 (a)(2) with respect to all Defendants.

WHEREFORE, the Plaintiff, MICHAELYNN SALVAGE, by and through her attorneys, RUBERRY, STALMACK & GARVEY, LLC, prays for judgment against the Defendant, MENTOR WORLDWIDE, LLC, a Foreign Corporation, in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT III

(Medical Negligence – New Horizons Center for Cosmetic Surgery, S.C., an Illinois Corporation and Leonard Lu, M.D., individually and as agent, servant and/or employee of New Horizons Center for Cosmetic Surgery, S.C., an Illinois Corporation)

NOW COMES the Plaintiff, MICHAELYNN SALVAGE, by and through her attorneys, RUBERRY, STALMACK & GARVEY, LLC, and complaining of the Defendants, NEW HORIZONS CENTER FOR COSMETIC SURGERY, S.C., an Illinois Corporation (said entity hereinafter referred to as “New Horizons”), and LEONARD LU, M.D., individually and as agent, servant, and/or employee of NEW HORIZONS CENTER FOR COSMETIC SURGERY, S.C., an Illinois Corporation (hereinafter referred to as “Lu”), states as follows:

1. In 2011 and at all times relevant herein, the Plaintiff was a resident of the City of Chicago, County of Cook, State of Illinois.
2. In 2011 and at all times relevant herein, the Defendant New Horizons was a corporation that was licensed to conduct business the State of Illinois.
3. In 2011 and at all times relevant herein, the Defendant New Horizons did conduct business in the State of Illinois.
4. In 2011 and at all times relevant herein, the Defendant New Horizons was engaged in the business of cosmetic surgery and medical procedures in the County of Cook, State of Illinois.
5. In 2011 and at all times relevant herein, Defendant Lu was a duly licensed physician and was licensed to practice medicine in Illinois, holding himself out as a qualified practitioner of the medical arts and sciences, specializing in the field of cosmetic surgery.

6. In 2011 and at all other times relevant herein, Defendant Lu was an agent, servant and/or employee of Defendant New Horizons.

7. In 2011 and at all other times relevant herein, Defendant Lu was acting in his capacity as agent, servant and/or employee of New Horizons when he provided care and treatment to the Plaintiff.

8. In 2011 and at all times relevant herein, any actions, inactions, deviations from the standard of care, and/or acts of negligence on the part of Defendant Lu were actions, inactions, deviations from the standard of care, and/or acts of negligence on the part of Defendant New Horizons.

9. In 2011 and at all times relevant herein, the Plaintiff received a consultation at New Horizons regarding breast implants.

10. In 2011 and at all times relevant herein, the Plaintiff underwent a procedure where Mentor silicone breast implants were surgically inserted at New Horizons.

11. Said Mentor silicone breast implants were inserted in 2011 at New Horizons by Defendant Lu.

12. Said Mentor silicone breast implants were inserted in Plaintiff throughout 2011, 2012, 2013, 2014, 2015, and 2016.

13. Plaintiff began to experience numerous health issues and symptoms with respect to said Mentor silicone breast implants in 2017, including but not limited to joint pain, chronic fatigue syndrome, brain fog, temperature intolerance, dry skin, infections, headaches, breast pain, chest pain, weight gain, autoimmune issues, and a disorder known as Breast Implant Illness, among other things.

14. Said Mentor silicone breast implants were removed from Plaintiff on June 29, 2017 by Dr. Florence Mussat in Chicago, Illinois.

15. Between 2011 and 2017 and at all times relevant herein, the Plaintiff had no notice or knowledge that said Mentor silicone breast implants were inserted incorrectly or that said implants needed to be removed.

16. From 2017 to the present, as a result of the Mentor silicone breast implants being inserted incorrectly and/or needing to be removed prior to June 29, 2017, the Plaintiff was caused to suffer serious and debilitating injuries, including but not limited to joint pain, chronic fatigue syndrome, brain fog, temperature intolerance, dry skin, infections, headaches, breast pain, chest pain, weight gain, autoimmune issues, and a disorder known as Breast Implant Illness, among other things.

17. Prior to 2011 and at all times relevant herein, the Defendants New Horizons and Lu had a duty to treat all patients, including Plaintiff, in accordance with the accepted standards of care in the community.

18. Prior to 2011 and at all times relevant herein, the Defendants New Horizons and Lu had a duty to exercise reasonable care in the medical treatment, examination, diagnosis, performance of medical exams, testing, and monitoring of all patients, including Plaintiff.

19. In 2011 and at all times relevant herein, Plaintiff placed her trust and reliance in Defendants New Horizons and Lu for her complete care and well-being.

20. Prior to June 29, 2017 and at all other times relevant herein, Defendants New Horizons and Lu should have reasonably anticipated the harm that patients such as Plaintiff may suffer due to

the incorrect insertion of the Mentor silicone breast implants and/or the implants needing to be removed prior to June 29, 2017.

21. That notwithstanding the aforementioned duties, Defendants New Horizons and Lu deviated from the accepted standards of care and negligently and carelessly committed one or more of the following wrongful acts and/or omissions:

- a. Failed to properly insert and/or position the Mentor silicone breast implants in Plaintiff in 2011;
- b. Failed to properly monitor and treat the Plaintiff after the insertion of the Mentor silicone breast implants;
- c. Failed to timely diagnose Plaintiff with Breast Implant Illness prior to June 29, 2017;
- d. Failed to timely remove said Mentor silicone breast implants prior to June 29, 2017;
- e. Failed to warn the Plaintiff of the dangers and risks of said silicone breast implants which either were known and/or which ought to have been known;
- f. Failed to offer the Plaintiff a reasonable alternative to the silicone breast implants;

22. As a direct and proximate result of one or more of the foregoing acts and/or omissions of the Defendants as described above, the Plaintiff MICHAELLYNN SALVAGE, was permanently injured and has suffered serious and debilitating injuries including but not limited to joint pain, chronic fatigue syndrome, brain fog, temperature intolerance, dry skin, infections, headaches, breast pain, chest pain, weight gain, autoimmune issues, and a disorder known as Breast Implant Illness, among other things; has required extensive medical treatment; has endured and will in the future endure conscious pain and suffering; has become permanently disabled and disfigured; has suffered a loss of the enjoyment of a normal life; has suffered a loss of wages as a Chicago Police

Officer; and has incurred and will incur in the future great sums for medical and rehabilitative services.

23. Plaintiff's damages are in excess of Fifty Thousand Dollars (\$50,000.00), the minimal jurisdictional amount of this Court.

24. Plaintiff's attorney has filed herewith, an affidavit pursuant to the provisions of 735 ILCS 5/2-622 (a)(2) with respect to all Defendants.

WHEREFORE, the Plaintiff, MICHAELLYNN SALVAGE, by and through her attorneys, RUBERRY, STALMACK & GARVEY, LLC, prays for judgment against the Defendants, NEW HORIZONS CENTER FOR COSMETIC SURGERY, S.C., an Illinois Corporation, and LEONARD LU, M.D., individually and as agent, servant, and/or employee of NEW HORIZONS CENTER FOR COSMETIC SURGERY, S.C., an Illinois Corporation, in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

RUBERRY, STALMACK & GARVEY, LLC

By: _____

Craig A. Hoffman
Ruberry, Stalmack & Garvey, LLC
10 S. LaSalle St., Suite 1800
Chicago, Illinois 60603
Telephone - (312) 466-7219
Facsimile - (312) 466-8055

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION

MICHAELLYNN SALVAGE,

Plaintiff,

v.

MENTOR WORLDWIDE, LLC, a Foreign
Corporation, NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation, and LEONARD LU, M.D.,
individually and as agent, servant and/or
employee of NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation,

Defendants.

No.

AFFIDAVIT OF DAMAGES PURSUANT TO SUPREME COURT RULE 222(b)

The undersigned being first duly sworn upon oath, deposes and states that he is the attorney for the Plaintiff in the above titled cause of action seeking money damages and states that said cause of action:

_____ DOES NOT EXCEED \$50,000.00

 X DOES EXCEED \$50,000.00

Under penalties as provided by law pursuant to Section 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

RUBERRY, STALMACK & GARVEY, LLC

By: _____

Craig A. Hoffman
Ruberry, Stalmack & Garvey, LLC
10 S. LaSalle St., Suite 1800
Chicago, Illinois 60603
Telephone - (312) 466-7219
Facsimile - (312) 466-8055

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION

MICHAELYNN SALVAGE,

Plaintiff,

v.

MENTOR WORLDWIDE, LLC, a Foreign
Corporation, NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation, and LEONARD LU, M.D.,
individually and as agent, servant and/or
employee of NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation,

Defendants.

No.

AFFIDAVIT

I, Craig A. Hoffman, being first duly sworn on oath deposes and states as follows:

1. That I was unable to obtain a consultation as required by 735 ILCS 5/2-622 (a) (1) because the statute of limitations would impair the action and the consultation required could not be obtained before the expiration of the statute of limitations.

FURTHER, affiant sayeth not.

Under penalties as provided by law pursuant to Section 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Craig A. Hoffman

Craig A. Hoffman
Ruberry, Stalmack & Garvey, LLC
10 S. LaSalle St., Suite 1800
Chicago, Illinois 60603
Telephone - (312) 466-7219
Facsimile - (312) 466-8055

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION**

MICHAELLYNN SALVAGE,

Plaintiff,

v.

MENTOR WORLDWIDE, LLC, a Foreign
Corporation, NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation, and LEONARD LU, M.D.,
individually and as agent, servant and/or
employee of NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation,

Defendants.

No.

AFFIDAVIT OF DAMAGES PURSUANT TO SUPREME COURT RULE 222(b)

The undersigned being first duly sworn upon oath, deposes and states that he is the attorney for the Plaintiff in the above titled cause of action seeking money damages and states that said cause of action:

_____ DOES NOT EXCEED \$50,000.00

 X DOES EXCEED \$50,000.00

Under penalties as provided by law pursuant to Section 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

RUBERRY, STALMACK & GARVEY, LLC

By: _____

Craig A. Hoffman
Ruberry, Stalmack & Garvey, LLC
10 S. LaSalle St., Suite 1800
Chicago, Illinois 60603
Telephone - (312) 466-7219
Facsimile - (312) 466-8055

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION

MICHAELLYNN SALVAGE,

Plaintiff,

v.

MENTOR WORLDWIDE, LLC, a Foreign
Corporation, NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation, and LEONARD LU, M.D.,
individually and as agent, servant and/or
employee of NEW HORIZONS CENTER FOR
COSMETIC SURGERY, S.C., an Illinois
Corporation,

Defendants.

No.

AFFIDAVIT

I, Craig A. Hoffman, being first duly sworn on oath deposes and states as follows:

1. That I was unable to obtain a consultation as required by 735 ILCS 5/2-622 (a) (1) because the statute of limitations would impair the action and the consultation required could not be obtained before the expiration of the statute of limitations.

FURTHER, affiant sayeth not.

Under penalties as provided by law pursuant to Section 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Craig A. Hoffman

Craig A. Hoffman
Ruberry, Stalmack & Garvey, LLC
10 S. LaSalle St., Suite 1800
Chicago, Illinois 60603
Telephone - (312) 466-7219
Facsimile - (312) 466-8055

Hearing Date: No hearing scheduled
 Courtroom Number: No hearing scheduled
 Location: No hearing scheduled

FILED
 6/25/2019 2:49 PM
 DOROTHY BROWN
 CIRCUIT CLERK
 COOK COUNTY, IL
 2019L007023

5547602

2120 - Served 2121 - Served
 2220 - Not Served 2221 - Not Served
 2320 - Served By Mail 2321 - Served By Mail
 2420 - Served By Publication 2421 - Served By Publication
 Summons - Alias Summons

(08/01/18) CCG 0001 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

MICHAELLYNN SALVAGE

(Name all parties)

v.

MENTOR WORLDWIDE, LLC et al.

Case No. 2019L007023

Please serve:
 LEONARD LU, M.D.
 230 Center Dr.
 Suite 101
 Vernon Hills, IL 60061

☒ SUMMONS ☐ ALIAS SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit www.cookcountyclerkofcourt.org to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

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Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

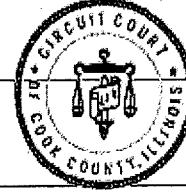
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Atty. No.: 48602
Atty Name: Craig Hoffman
Atty. for: Plaintiff
Address: 10 S. LaSalle St., Suite 1800
City: Chicago
State: IL Zip: 60603
Telephone: 312-466-8050
Primary Email: craig.hoffman@ruberry-law.com

Witness: _____



DOROTHY BROWN, Clerk of Court

Date of Service: _____
(To be inserted by officer on copy left with
Defendant or other person):

CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- ☐ Richard J Daley Center
50 W Washington
Chicago, IL 60602
- ☐ District 2 - Skokie
5600 Old Orchard Rd
Skokie, IL 60077
- ☐ District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008
- ☐ District 4 - Maywood
1500 Maybrook Ave
Maywood, IL 60153
- ☐ District 5 - Bridgeview
10220 S 76th Ave
Bridgeview, IL 60455
- ☐ District 6 - Markham
16501 S Kedzie Pkwy
Markham, IL 60428
- ☐ Domestic Violence Court
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Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois
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Hearing Date: No hearing scheduled
 Courtroom Number: No hearing scheduled
 Location: No hearing scheduled

FILED
 6/25/2019 2:49 PM
 DOROTHY BROWN
 CIRCUIT CLERK
 COOK COUNTY, IL
 2019L007023

5547602

2120 - Served 2121 - Served
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(Name all parties)

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Please serve: New Horizons Center
 for Cosmetic Surgery, S.C.
 R/A - C T Corporation System
 208 S. LaSalle St., Suite 814
 Chicago, IL 60604

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6/25/2019 2:49 PM DOROTHY BROWN

Atty. No.: 48602

Witness: _____

Atty Name: Craig Hoffman

Atty. for: Plaintiff

Address: 10 S. LaSalle St., Suite 1800

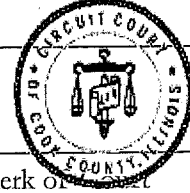
City: Chicago

State: IL Zip: 60603

Telephone: 312-466-8050

Primary Email: craig.hoffman@ruberry-law.com

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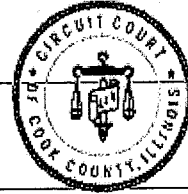
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